



ROOSEVELT M. SIMMONS, a/k/a Blackjack;” RANDOLPH ELLIS, “Randy;” BRIAN DEMETRIUS CLARKE, a/k/a “Omar;” CASSANDRA BLUNT; CLIFTON WOOTEN; DERRICK DIMETREUS BAILEY, JR.; ANGELO M. CLAIBORNE, a/k/a “Anlo,” and NAVYETA C. KING, a/k/a “Tiny Baby;” did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with each other and other people, both known and unknown to the Grand Jury, to commit offenses against the United States, to wit:

(a) to manufacture more than fifty (50) grams of a mixture or substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 and 841(b)(1)(A)(iii); and

(b) to possess with the intent to distribute more than fifty (50) grams of a mixture or substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance, in violation of Title 21, United States Code Sections 841 and 841(b)(1)(A)(iii); and

(c) to distribute more than fifty (50) grams of a mixture or substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 and 841(b)(1)(A)(iii).

(All in violation of Title 21, United States Code, Section 846.)

#### **FORFEITURE BASED UPON COUNT ONE**

As a result of any of the foregoing offenses, the defendants shall forfeit to the United States of America any and all property constituting or derived from any proceeds obtained, directly or indirectly, as the result of said violation; and any and all of said property used or

intended to be used, in any manner or part, to commit or to facilitate the commission of the aforesaid violation.

(In accordance with 21 U.S.C. § 853.)

### **COUNT TWO**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about May 10, 2001, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, ROOSEVELT M. SIMMONS, did knowingly, intentionally, and unlawfully possess with the intent to distribute a mixture and substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1).)

### **COUNT THREE**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about June 15, 2001, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, ROOSEVELT M. SIMMONS, did knowingly, intentionally, and unlawfully possess with the intent to distribute more than five grams of a mixture and substance containing detectable amounts of cocaine base, described in Title 21, United States Code, § 841(b)(1)(B)(iii), commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).)

#### **COUNT FOUR**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about August 30, 2001, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, CASSANDRA BLUNT, did knowingly, intentionally, and unlawfully possess with the intent to distribute a mixture and substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1).)

#### **COUNT FIVE**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about December 15, 2001, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, BRIAN DEMETRIUS CLARKE, did knowingly, intentionally, and unlawfully possess with the intent to distribute more than five grams of a mixture and substance containing detectable amounts of cocaine base, described in Title 21, United States Code, § 841(b)(1)(B)(iii), commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).)

#### **COUNT SIX**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about January 15, 2002, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, NAYVETA C. KING, did knowingly, intentionally, and unlawfully possess with the intent to distribute a mixture and substance containing detectable

amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1).)

#### **COUNT SEVEN**

(Possession With Intent to Distribute Controlled Substance - **Crack Cocaine**)

On or about January 22, 2002, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, JAMES EARL TYNES, did knowingly, intentionally, and unlawfully possess with the intent to distribute more than five grams of a mixture and substance containing detectable amounts of cocaine base, described in Title 21, United States Code, § 841(b)(1)(B)(iii), commonly known as “crack,” a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).)

#### **COUNT EIGHT**

(Maintenance of Place for Distributing Controlled Substances)

Beginning in or about June 1999, the exact date being unknown, and continuing until January 28, 2002, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, CASSANDRA BLUNT, did knowingly and unlawfully maintain a place, to wit: a property and residence known as 79 Flower Dew Lane, Surry, Virginia, and did aid and abet in the maintenance of said residence, for the purpose of manufacturing, storing, distributing, and using controlled substances, and did manage and control a building, room, and enclosure, as an owner or lessee, and did knowingly and intentionally make it available for use for the purpose of unlawfully manufacturing, storing, distributing and using controlled substances.

(In violation of Title 21, United States Code, Section 856, and Title 18, United States Code, Section 2.)

A TRUE BILL

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FOREPERSON

PAUL J. McNULTY  
UNITED STATES ATTORNEY

By:

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Laura C. Marshall  
Assistant United States Attorney